**ACTON •
MICKELSON •
ENVIRONMENTAL, INC.**

Consulting Scientists, Engineers, and Geologists

June 8, 2005

Mr. Craig Hunt, Water Resource Control Engineer — Via Overnight and E-mail
Regional Water Quality Control Board—North Coast Region
5550 Skylane Boulevard, Suite A
Santa Rosa, CA 95403 — 16017.10

Subject: Response to RWQCB Comments on
TRC's Phase I and Phase II Environmental Site Assessments
Former Georgia Pacific California Wood Products Manufacturing Facility
Fort Bragg, California

Dear Mr. Hunt:

This letter is submitted by Acton • Mickelson • Environmental, Inc. (AME) on behalf of Georgia Pacific Corporation (G-P) in response to the March 25, 2005 letter from the Regional Water Quality Control Board (RWQCB) – North Coast Region regarding Phase I and Phase II Environmental Site Assessments (ESAs) conducted at the G-P California Wood Products Manufacturing Facility, 90 West Redwood Avenue, Fort Bragg, California (facility). The ESAs were conducted by TRC Companies, Inc. (TRC) on behalf of G-P. Each comment made by the RWQCB is italicized and indented, followed by the associated response.

GENERAL COMMENTS

> *Although the general scope of the site was discussed in the assessments performed and figures contained in the assessments have outlined the site, a rigorous description of what real properties constitute the site has not been included. A more detailed description of what real properties were included in the assessments, including Assessor Parcel Numbers, should be submitted. Any other properties owned by Georgia-Pacific Corporation in the vicinity of the mill should also be noted.*

G-P is in the process of obtaining information regarding property boundaries and associated Assessor Parcel Numbers (APNs) for the facility and other properties in the area that are owned by G-P. This information will be compared to areas of previous assessments in a written response and forwarded to the RWQCB when it is available.

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> *Since the work done to prepare the Phase I report, there have been some operational changes at the plant. It came to our attention that one of these operations included treating lumber using a dip-tank inside one of the buildings. A description of all operations at the site since the Phase I report was prepared and that were not included in the Phase I report should be submitted. These descriptions should include information on the chemicals used and the locations of the use and storage of the chemicals.*

A table relating facility processes, substances, waste byproducts, associated chemicals of potential concern (COPCs), and analytical test methods has been prepared and is attached to this letter as Table 1. The table summarizes all facility processes, some of which were described in the previous Phase I ESA report. The table includes products associated with lumber surface treatment and lumber treatment at dip-tanks. The facility Hazardous Materials Business Plan compiles information regarding chemical type, storage and use, associated material safety data sheets, and emergency response plans. Attached are Emergency Response Plan Drawings from the Hazardous Materials Business Plan that show hydraulic unit locations, and chemical product types and storage locations in facility buildings.

> *It has been proposed that soils under some building foundations be remediated or addressed when the foundations are removed as part of demolition activities. I had informed you that a detailed workplan would need to be submitted for approval describing how soils would be screened for proper treatment, disposal, or reuse. We received a workplan regarding this work March 23, 2005. That workplan has not yet been reviewed.*

Work Plan for Foundation Removal, Additional Investigation, and Interim Remedial Measures (March 21, 2005 Work Plan) was submitted to the RWQCB on March 21, 2005. Addendum #1 (Addendum) to the March 21, 2005 Work Plan was submitted to the RWQCB on May 6, 2005. The Addendum includes the strategy for soil sampling beneath removed building foundations and in other excavation areas. AME acknowledges that the RWQCB has received the March 21, 2005 Work Plan and Addendum, though has not established a timetable for review.

> *Soil samples from many areas of the site were impacted with varying concentrations of heavier petroleum hydrocarbons. The risks posed by these impacts needs to be systematically addressed.*

G-P has contracted with Tetra Tech, Inc. (Tetra Tech) to perform a health risk assessment to evaluate chemical concentrations that can remain in place and are protective of human health and the environment. AME and Tetra Tech are working with the California Office of Environmental Health Hazard Assessment (OEHHA) to agree on the technical approach and methodology of the risk assessment. Representatives of G-P, AME, Tetra Tech, the RWQCB, and OEHHA attended a March 29, 2005 meeting concerning parameters of the health risk assessment. Attached is an April 15, 2005 letter from AME to OEHHA summarizing discussions held in the meeting.

> *In the Phase II report, generally no impacts were noted regarding concentrations of metals detected. I do not concur that there have not been impacts. A systematic approach needs to be taken to determine which detections represent local background concentrations and which represent impacts. After that is completed, an evaluation will then need to be made to address what risks are posed by those impacts.*

A technical approach to evaluate metals background concentrations is being proposed by AME in an upcoming health risk assessment work plan. Background metals concentration data will be used in the risk assessment to evaluate concentrations that pose risks to human health and the environment.

> *The investigation reports submitted thus far have not included figures of contaminant levels. Your response to these comments should include figures showing contaminant levels detected in soil and groundwater. The results of the different stages of investigation should be consolidated on the same figures. These figures should include enlargements of areas of interest. At our March 10, 2005 meeting, you presented to me paper copies of new draft figures incorporating some of these comments. The new figure format is very useful. Final versions of these figures, including the electronic format presented (allowing for zooming in on the figures), should be included in your response.*

The 4D visualization files referenced in the comment showing soil and ground water contaminant concentrations for each of the ten parcels at the facility were uploaded to the RWQCB's FTP site on April 11, 2005 for your review and use. These figures consolidate soil and ground water chemical concentration data from each phase of investigation performed through December 2004, including first quarter 2004 through fourth quarter 2004 ground water monitoring events. The figures can be translated and magnified using the appropriate software.

> *I have previously requested that all water, soil, and vapor lab data, monitoring well survey, elevation, and depth to water data, and a site map be sent to the State Water Resources Control Board GeoTracker database. To date, a map, survey data, and the depth to water data from the first and second quarter 2004 monitoring events have been submitted. No analytical data has been submitted. This data still needs to be submitted. Also, the GeoTracker regulations have recently been revised. Future investigation reports and bore hole logs will need to be submitted to the GeoTracker system. The regulations also address shifting reporting requirements for contamination investigation sites away from the submittal of paper reports. Unless and until this office otherwise directs you, reports for this case still need to be submitted to this office in paper form and on CD in addition to the GeoTracker electronic submittal requirements.*

AME has uploaded to GeoTracker depth to water and ground water analytical data for first quarter 2005 monitoring performed by AME in March 2005. We understand that analytical data for previous monitoring events have yet to be uploaded. These data will be compiled into electronic data file (EDF) format and ready for uploading to GeoTracker when the process is complete. We acknowledge the new requirement for uploading investigation reports and bore hole logs to GeoTracker. All future reports for this project will be provided to the RWQCB in paper and electronic formats as requested.

> *Appendix F of the Phase II report was a copy of the text of a 1998 report by TRC of investigation results. The investigation included soil sampling from in and around structures to be demolished. These included Planing Mill Number 1, Planing Mill Number 50, and the sawmill including the green chain. However, not all the results were included in this copy of the report. Please submit a full copy of the report. The report also contained recommendations for additional investigation in the following areas:*
>
> - *"Former dip tank in Planing Mill Number 1*
> - *Eastern portion of Sawmill*
> - *Western exterior of Sawmill (i.e., near Boring SM-12)*
> - *Soils beneath Green Chain structure*
> - *Areas in the vicinity of former equipment footings in Planing Mill Number 1."*
>
> *These recommendations do not all appear to have been acted upon in the Phase II investigation work. These recommendations should be followed up on in the next phase of work. In addition, please elaborate on the former dip tank in Planing Mill Number 1.*

We have obtained copies of laboratory reports from the 1998 TRC report referenced in your comment and have included them with the attached report text and figures, which were presented in Appendix F of the Phase II ESA report.

Investigation of soils beneath Former Sawmill #1 and the Green Chain structure are included in AME's March 21, 2005 Work Plan. The other areas recommended for further investigation are being incorporated into the *Work Plan for Additional Site Assessment*, dated June 8, 2005 (June 8, 2005 Work Plan), which will be submitted near the end of May 2005. The June 8, 2005 Work Plan will contain a provision for laboratory testing of COPCs in soil samples collected at the former dip tank location in Planer #1.

> *Photos of a facility map (the map was reportedly from 1962) were provided to me. The map shows the locations of at least some of the underground water pipes on the site. Some of the pipes are listed as transite pipe. I include other items of potential interest from this map through the rest of my comments.*

AME has obtained a copy of the 1960s facility map referenced in the RWQCB letter. The map has been reviewed for use in locating historical structures proposed for investigation in the June 8, 2005 Work Plan. We acknowledge that the map shows the locations of underground water pipelines that are listed as transite construction. There is the potential for contact with these transite pipes during the subsurface activities proposed in the March 21, 2005 Work Plan and the June 8, 2005 Work Plan. In such an event, all asbestos related work will be conducted in general accordance with local, state, and federal rules and regulations. A certified and trained contractor will be utilized to secure the necessary permits and conduct the required abatement activities.

> *The VOCs listed in the Phase II report tables did not include all the VOCs that were detected in the analytical reports. VOCs not listed in the tables that were detected in some samples included benzene, toluene, ethylbenzene, propylbenzene, and chlorobenzene. There were also some minor discrepancies between the SVOC analytical results from the laboratory reports and the Phase II report tables.*

This comment regarding discrepancies between laboratory reports and past Phase II ESA report tables is acknowledged. AME has created a database of soil and ground water chemical data to help mitigate these types of data reporting errors in the future.

> *Dichloromethane and acetone were reported in the VOC analytical results for various samples. In some discussions regarding these detections, it has been suggested that these could be lab artifacts rather than actual detections. This needs to be clarified.*

Dichloromethane (also known as methylene chloride) and acetone are common laboratory artifacts as described in *U.S. Environmental Protection Agency Contract Laboratory Program National Functional Guidelines for Organic Data Review* published by the USEPA Office of Emergency and Remedial Response in October 1999. Future reports to the RWQCB will utilize the guidelines set forth in this publication to evaluate the presence of laboratory artifacts prior to report submittal.

> *In the Additional Assessment Report, analytical results for a clinker ash sample from Parcel 10 were included in an appendix. However, no discussion of the results were included in the report. The analytical method used for polynuclear aromatic hydrocarbons (PAHs) was a more sensitive method than previously used at the site. There were multiple detections for PAHs. Please conduct an evaluation of these results.*

Analytical results from a clinker ash sample from Parcel 10 were provided as an attachment in TRC's *Response to Comments, Regional Water Quality Control Board's Letter Dated August 12, 2004, Phase I and Phase II Environmental Site Assessments Reports, Georgia Pacific Fort Bragg Sawmill Site, 90 West Redwood Avenue, Fort Bragg, California* dated September 9, 2004. PAH analysis was performed using United States Environmental Protection Agency (USEPA) Method 8310. Multiple PAHs were reported in the sample with a maximum concentration of

140 micrograms per kilogram (µg/kg) dibenz (a, h) anthracene. Additional sampling and analysis of the Parcel 10 clinker ash pile using EPA Method 8310 is being proposed in the forthcoming June 8, 2005 Work Plan. The previous data will be evaluated along with the newly acquired data in the additional site assessment report and ongoing risk assessment.

> *In the laboratory reports with the Phase II report, there were results and a chain-of-custody listing for a soil sample labeled SS-1 and a water sample labeled CS-1. The date of the sampling was April 2, 2003 and the laboratory report number was 164563. Those samples had TPH-d, TPH-g, VOC, and SVOC detections. I did not find other references to these samples. Where were those samples collected?*

According to our review of TRC's chain-of-custody records, it appears that the initial phase of field point sampling was completed on April 1, 2003 and the next phase commenced in August 2003. The two samples in question were collected on April 2, 2003 at the end of the initial field program. These samples are believed to represent waste material samples as they are not referenced in the Phase II ESA report and appear to have been collected at the end of the initial field program on a day when no other field samples were collected.

> *The use of wood treatment chemicals in the last few years of facility operation was not addressed. A spray operation inside one of the buildings used a propiconazole wood treatment chemical. This operation needs to be evaluated for potential impacts.*

AME has made an evaluation of the lumber treatment process in development of the COPC table (Table 1). Propiconazole is a constituent of a fungicide with a trade name of Banner that was used for surface treatment of wood. Laboratory testing for propiconazole will be conducted on ground water samples collected at former Planer #1 and existing Planer #2 utilizing an in-house test method developed by the analytical laboratory.

> *The disposal or long-term disposition of any remaining ash and clinker piles needs to be addressed.*

The forthcoming June 8, 2005 Work Plan contains provisions to sample and analyze stockpile samples from the existing ash and clinker piles at the facility. The samples will be analyzed for total petroleum hydrocarbons (TPH) as diesel (TPHd), TPH as motor oil (TPHo), volatile organic compounds (VOCs), PAHs, and California Title 22 metals. Select samples will be additionally analyzed for dioxins and furans and polychlorinated biphenyls (PCBs) where PAHs are present. The laboratory results will be reviewed to evaluate whether disposition of materials is required or, treatment and/or disposal options for the stockpiled materials.

PARCEL 2

> *I do not agree that one of the soil samples had metals concentrations representative of those found in the greater area. Specifically, the sample P2-4@2' had concentrations of lead, zinc, and mercury that appear to be above background concentrations.*

An evaluation of background metals concentrations is being proposed in the technical approach for the upcoming health risk assessment work plan. Previous data collected by others will be utilized in this evaluation, where appropriate, to identify areas where metals concentrations are greater than background concentrations.

> *It was stated that the groundwater sample from P2-6 did not indicate the groundwater was impacted by TPH-d. That groundwater sample did have, however, a TPH-d detection of 92 µg/L with a laboratory notation that the detection was due to a heavier product.*

Additional sampling of ground water from a newly installed monitoring well is being proposed hydraulically downgradient of boring P2-6 in the June 8, 2005 Work Plan to evaluate ground water TPHd conditions. TPHd analyses will be run using the silica gel cleanup (SGCU) method to screen out compounds that may have been falsely quantified as TPHd in previous analyses that did not use SGCU.

> *The TPH detected in the P2-2 groundwater sample needs to be further investigated.*

A ground water monitoring well is proposed upgradient of boring P2-2 in the June 8, 2005 Work Plan to evaluate the source of TPH reported in a grab ground water sample from this boring. As stated in the previous response, a downgradient well is also planned northwest of boring P2-6 as part of the June 8, 2005 Work Plan.

> *It was recommended that soil excavation be performed in the areas of P2-3 and P2-6. Removal in the area of P2-4 may also be needed. Overall, before building foundations are removed, a workplan will need to be submitted for approval outlining how soils under buildings will be screened for contamination.*

AME's March 21, 2005 Work Plan and Addendum dated May 6, 2005 contain provisions for screening soil contamination beneath removed building foundations under the February 2005 CDP application. These documents cover buildings slated for demolition and foundation removal in Parcels 3 and 4. It is anticipated that a similar approach will be proposed in other building areas under a future CDP.

> *Is there any additional information on the composition the glues used in the glue lam building? The potential for those glues to have impacted soil and groundwater should be evaluated.*

We have researched the composition of the glue used in the Glue Lam area in development of Table 1. The glues reportedly contained phenol and resorcinol resins. The analytical laboratory has agreed to include phenol and resorcinol in their EPA Method 8270 analyte list, though some method development for their detection is required.

> *Due to the heavier TPH detections and the glue use, SVOCs should be included with the analyses of the monitoring well groundwater samples.*

Testing for semi-volatile organic compounds (SVOCs) using EPA Method 8270 is being added in the June 8, 2005 Work Plan to the suite of analyses for ground water samples collected at Parcel 2.

> *In the three monitoring events of the monitoring wells, the groundwater gradient indicated by the three Parcel 2 monitoring wells has been west-northwest. A monitoring well should be placed in a more downgradient direction of the glue lam area. Another monitoring well should be placed in the immediate area of P2-11.*

The June 8, 2005 Work Plan includes the installation of ground water monitoring wells downgradient (west-northwest) of the Glue Lam area as well as downgradient of boring P2-11 and well MW-2.1 at the Helicopter Pad.

PARCEL 3

> *It appears that in the Phase II report figures and subsequent figures, Former Planer Number 1 and Planer Number 50 are mislabeled as Former Planer Number 50 and Planer Number 5, respectively. My comments are based on the Phase II text and the Phase I figures as being correct and the Phase II figures as being incorrect.*

Comment acknowledged. AME will refer to the northern Parcel 3 planer building as Former Planer #1 and the southern planer building as Planer #50.

> *Pothole P3-TP1 was reported in the Phase II report tables and boring logs; however, I have not located it on the maps. Where was this pothole?*

According to the Phase II ESA report, a land survey of the location of pothole P3-TP1 was not performed. According to a reference in Section 5.3.11 of the Phase II ESA report, Pothole P3-TP1 was located in the area of the geophysical anomaly east of the Machine Shop Building area.

Railroad Spurs

> *All the soil samples taken from this area for laboratory analysis were from 6 inches below the surface and no groundwater samples were taken. Further investigation in this area is needed to evaluate for the potential for deeper*

impacts and impacts to groundwater. This is in addition to the recommended additional investigation for the petroleum impact in the P3-12 area.

In the June 8, 2005 Work Plan, AME proposes additional soil and grab ground water sampling in the Parcel 3 Railroad Spurs area to evaluate potential deeper soil impacts and potential impacts to ground water. Additional soil and grab ground water sampling locations in the vicinity of boring P3-12 are also being proposed. Note that boring P3-12 is not depicted on figures provided in the Phase II ESA report and two locations are designated as "P3-13/P3-PH4" on Figure 5 of the report. Based on a review of survey coordinates provided on the log of pothole P3-PH2, it appears that the northern location designated as P3-13/P3-PH4 on Figure 5 is actually pothole P3-PH2 and is assumed to also represent the location of boring P3-12. Future borings intended to investigate soil conditions near boring P3-12 will be located near the northerly mapped location of P3-13/P3-PH4.

Planer #50

The results from the 1998 soil investigation in this area need to be submitted to this office.

AME has obtained the laboratory reports from the 1998 investigation and included them with the attached text and figures from the report, which were presented as Appendix F in TRC's Phase II ESA report.

The 1960's facility map shows transformers located between the Planar Number 5 building and the Planar Number 1 building. That location should be investigated for PCB impacts.

The June 8, 2005 Work Plan proposes two soil boring locations in the vicinity of the transformers located between Former Planer #1 and Planer #50. Soil samples from these borings will be analyzed for PCBs using EPA Method 8082.

Planer #1

The reported TPH concentrations from the 1998 investigation were higher for the southern half of this building than were the TPH concentrations detected in the two Phase II borings performed at the southeast corner of the building (P3-20, P3-21). The groundwater in and downgradient of the more heavily impacted areas needs to be investigated.

The June 8, 2005 Work Plan proposes several soil borings with grab ground water sampling in the area of previously identified TPH impact to soil in Former Planer #1. The June 8, 2005 Work Plan will also include the installation of two monitoring wells south and west of Former Planer #1 to evaluate potential downgradient TPH impacts to ground water.

Dry Shed Numbers 4 And 5

> *The SVOC chemical analysis used did not include tetrachlorophenol as an analyte. Tetrachlorophenol was the chlorophenol ingredient in one treatment chemical allegedly used at the site. In addition, the reporting limit for pentachlorophenol in the analysis used was 19 µg/L in water. The California Office of Environmental Health Hazard Assessment's Public Health Goal for pentachlorophenol in drinking water is 0.4 µg/L. Groundwater in and downgradient of areas of potential wood treatment chemical use should be tested for pentachlorophenol and tetrachlorophenol using an analytical method with greater sensitivity for these analytes. Possible areas of wood treatment chemical application include the former dip tank location, the green chain area, and lumber storage and loading areas in Parcel 3.*

Attached Table 1 lists testing for pentachlorophenol and tetrachlorophenol in former lumber surface treatment and dip tank areas. Ground water sample analytical data for pentachlorophenol will be reported to the method detection limit (MDL) of 0.1 microgram per liter (µg/L) using EPA Method 515.1. It should be noted that the Environmental Screening Level (ESL) of 1 µg/L pentachlorophenol established by the Regional Water Quality Control Board – San Francisco Bay Region is close to the Public Health Goal (PHG) of 0.4 µg/L. Tetrachlorophenol is being added to the laboratory's list of EPA Method 8270 analytes and will also be reported to the MDL associated with that compound.

> *The 1960's facility map shows a building labeled "Lumber Treating" located in the approximate area of borings P3-56 and P3-57, which were put in a location alleged to have had a dip tank.*

Based on a review of the 1960s facility map, four soil borings with grab ground water sampling are being proposed in the former Lumber Treating building area in the June 8, 2005 Work Plan.

Former Mobile Equipment Shop

> *PAHs were not tested for in this area except for the more recent groundwater samples from the monitoring wells. Soils impacted with TPH should be tested for PAHs.*

Comment acknowledged. Future soil and ground water samples collected in the Former Mobile Equipment Shop area, including those proposed in the March 21, 2005 and June 8, 2005 Work Plans, will be analyzed for PAHs in addition to TPH.

> *MTBE was detected in the soil samples from P3-35 and in groundwater samples from P3-35 and MW-3.1. The extent of the MTBE contamination should be determined. This includes investigating in the upgradient direction.*

The June 8, 2005 Work Plan proposes soil and grab ground water sampling to evaluate the extent of methyl tertiary butyl ether (MTBE) impact. Monitoring well locations will be selected based on a review of the initial analytical data. The evaluation of proposed monitoring well locations will also consider the upgradient direction as a potential source of MTBE impact.

> *Chlorinated VOCs were detected in multiple groundwater samples from this area, including the three monitoring wells. The extent of the chlorinated VOC contamination should be determined. This includes investigating in the upgradient direction.*

Similar to the previous response, the extent of chlorinated VOCs in ground water will be evaluated in selecting future monitoring well locations. It should be noted however that reported concentrations of chlorinated VOCs in both grab and monitoring well ground water samples collected through December 2004 have not exceeded Maximum Contaminant Levels (MCLs) established by the U.S. Environmental Protection Agency.

> *The water sample from P3-28 appeared to be impacted with a lighter petroleum product, like gasoline, in addition to the heavier petroleum products detected in this area. The extent of that contamination should be investigated.*

Proposed monitoring well installations in this area will consider evaluating the extent of lighter petroleum products reported in the grab ground water sample from boring P3-28.

Construction Engineering

> *In the Phase I report, a paint storage shed was identified west of the main building. The area of the shed should be evaluated.*

The June 8, 2005 Work Plan includes two soil borings in the area of the paint storage shed west of the main Construction Engineering building.

Kilns Area

> *I have no comment for this area except for the general comments for the site.*

Comment acknowledged.

Compressor House

> *The extent of the contamination found in this area needs to be investigated.*

Excavation and removal of the Compressor House building foundation and subsequent investigation and interim remedial measures (IRMs) are discussed in AME's March 21, 2005 Work Plan. The area will be evaluated following approval of the associated CDP application and the approval and implementation of scope of work described in the March 21, 2005 Work Plan.

In the Phase II report, excavation of soil around P3-47 to a minimum depth of one foot was recommended. Any remedial action in this area will need to go deeper since the four foot sample from P3-47 was more heavily impacted than the 0.5 foot sample.

See previous response.

Machine Shop / Sheet Metal / Plumbing / Plant Supply

I concur with the recommendation to excavate soils when the foundations are removed. Soils around the buildings, including behind the buildings, will also need to be addressed.

Soils beneath the building foundation with COPC concentrations greater than risk-based levels established in the risk assessment will be remediated by excavation and removal or other method under a future CDP. We concur that soil exterior of the building needs to be addressed and this will be accomplished in the scope of work that will be presented in the June 8, 2005 Work Plan.

Covered Shed

I concur with the Phase II recommendation that further investigation is needed in this area. However, this includes impacts with metals that were not mentioned in the report text. In soil sample P3-54@1', the lead, copper, cadmium, and zinc concentrations appear to be one to two orders of magnitude greater than the concentrations more typically encountered across the site.

The June 8, 2005 Work Plan includes soil borings in the Covered Shed area. Analysis of soil samples from this area will include testing for California Title 22 metals.

Overhead Transformers

No comment.

Comment acknowledged.

PARCEL 4

According to a Regional Water Board staff inspection memo from 1986, there was a Cat fueling area by the hog fuel pile. In that area there was oily material on the dirt. The approximately 500- gallon AST had no berms. There was an oily sheen from there to the pump station in the discharge culvert. In a follow-up letter from GP, it was stated that the diesel AST by the powerhouse was removed and a mobile fuel truck would be used. Potential impacts in this area need to be investigated.

According to G-P personnel, the former diesel AST was located north of the Fuel Barn near the northwest corner of the building and fuel was gravity fed from the AST through an aboveground pipeline for refueling equipment. There reportedly was no underground distribution piping associated with the AST. The June 8, 2005 Work Plan includes two soil borings in this area.

The fuel AST lines should be dug up and the soil inspected for impacts.

As stated in the previous response, no underground distribution piping was associated with the AST.

The two cooling tower borings were performed to the east and west of the cooling towers. Sampling should be done directly beneath the cooling towers building.

Sampling directly beneath the cooling towers will be performed as described in AME's March 21, 2005 Work Plan and Addendum.

The Phase II report contained recommendations to investigate geophysical survey anomalies in Parcel 4. These do not appear to have been investigated with the additional assessment work.

The June 8, 2005 Work Plan contains provisions to investigate the nature of the geophysical anomalies reported at the Powerhouse and in the Former Bunker Fuel AST area in the Phase II ESA report.

Ponds

The full depth of the sediments of the ponds west of the powerhouse should be investigated.

The June 8, 2005 Work Plan will include borings at Ponds 6 and 7 west of the Powerhouse to investigate the full depth of the sediments in each pond.

From our files, there was another pond in between the fuel house and Pond 6. That filled pond should be investigated.

The June 8, 2005 Work Plan will include soil borings to investigate the Former Pond between Pond 6 and the Fuel Barn.

Former Bunker Fuel Aboveground Storage Tanks

In 1992, a soil and groundwater investigation in the area of the bunker C tank farm area (now the former bunker fuel ASTs area). Soil and groundwater was found to be impacted with petroleum product. I did not find in our files a report of any remedial action in this area. The petroleum impact to this area needs to be addressed.

The June 8, 2005 Work Plan will include four soil borings with grab ground water sampling to investigate potential petroleum impact in the Former Bunker Fuel AST area.

Power House Fuel Storage

> *I have no comment on this area except for the general comment and the comment above regarding the fuel lines.*

The fuel lines identified near the Powerhouse Fuel Storage building in the Phase II ESA report will be field located using geophysical methods under the June 8, 2005 Work Plan. The lines will be removed and the soil beneath them will be inspected and sampled to evaluate potential petroleum impact.

Power House

> *Some impacts of petroleum and metals were found with the additional investigation performed in July 2004. The extent of these impacts needs to be determined. Additionally, investigation should extend deeper under the powerhouse. Additional investigation of soils under the powerhouse could be completed after the removal of the powerhouse foundation, as recommended in the Phase II report.*

The investigation of soils beneath the Powerhouse and related IRMs were addressed in AME's March 21, 2005 Work Plan and Addendum. Soil sampling for these activities will be used to assess the potential impacts of petroleum and metals in this area.

> *Boring logs for the borings done in the Power House area in July 2004 were not included with the Additional Site Assessment Report.*

According to the TRC project manager, logs were not drafted for the borings completed at the Powerhouse during the July 2004 additional site assessment and are therefore not available.

> *In the Phase I report, the paint shed south of the powerhouse was identified as needing investigation. That investigation does not appear to have been performed. That investigation should be performed.*

The investigation of the Paint Shed south of the Powerhouse is associated with removal of the building foundation and is included in the March 21, 2005 Work Plan.

Press Building

> *From the laboratory reports, the deeper (3') soil sample from boring P4-21 was analyzed for TPH-d outside of the maximum sample hold time for the method.*

Comment acknowledged. Future work that is being proposed in the June 8, 2005 Work Plan will utilize quality control protocols described in the associated Quality Assurance Plan (QAP) to mitigate the possibility of exceeding sample analytical hold times. The laboratory will track sample hold times from sample receipt until analysis as part of this process.

> *The extent of the contamination found in this area should be investigated. In addition, the soils under the building foundation should be evaluated for impacts when the foundation is removed.*

An evaluation of the soils beneath the Press Building is proposed in the March 21, 2005 Work Plan. Petroleum impact identified in soil samples from boring P4-21 will be addressed when the March 21, 2005 Work Plan is implemented.

Oil Storage Shed

> *Surface soil in this area was found to be impacted with petroleum product. However, no samples deeper than six inches were collected. The extent of the contamination in this area needs to be determined. This should include investigation directly beneath the shed.*

An evaluation of the soil beneath the Oil Storage Shed is included in the March 21, 2005 Work Plan. The extent of petroleum impact will be evaluated when the March 21, 2005 Work Plan is implemented.

Transformers

> *No comment.*

Comment acknowledged.

PARCEL 5

> *According to Regional Water Board staff inspection memos and correspondence from 1987 in our files, there was an open pit that received some truck wash wastewaters. Regional Water Board staff noted that pit soils appeared to be impacted with oil. One boring was completed to 8' at this location. Heavy petroleum impacts were not indicated, but Regional Water Board staff did note that at 8' the bottom of the pit wastes had not been reached. Although the location of the pit is not noted on any maps in our files, from photographs and notes in our files it appears that this pit was located southwest of the more current fuel storage and dispensing structure (noted as area 5.11 in the Phase I report). The pit appears to have since been filled in. There was also an AST next to this pit. On one map in our files, this area was identified as having a diesel storage tank.*

An investigation of the Open Pit and Former AST area is being proposed in the June 8, 2005 Work Plan under Parcel 5.

> *A separator associated with the pit may have been the oil trap identified southwest of the fuel storage structure in Figure 6.2 of the Phase I report. This area needs additional evaluation.*

An investigation of this area is being proposed in the June 8, 2005 Work Plan.

> *The facility map from the 1960's identifies the building west of the mobile equipment shop as record storage and general storage. This seems to be the structure noted in the Phase I report in older aerial photographs of the site that was subsequently replaced with the tire shop building. Also on the map a 1000-gallon buried diesel tank is shown just north of the northwest corner of this building. This may or may not correspond with the potential UST identified in the geophysical survey performed west of the mobile equipment shop. The UST identified on the 1960's map may have been west of the geophysical survey. In addition, a buried waste diesel tank is shown on the 1960's map north of the northwest corner of the mobile equipment shop. This location may have been outside the limits of the geophysical survey area. Both of these locations should be further evaluated.*

Soil borings with grab ground water sampling are being proposed in the area of the Former Diesel AST west of the Mobile Equipment Shop and in the area of the Former Waste Diesel UST northwest of the Mobile Equipment Shop in the June 8, 2005 Work Plan.

> *The Sanborn maps provided in the Phase I report show an open refuse fire location south of Sawmill Number 1. This area should be investigated.*

An investigation of the Open Refuse-Fire area south of Former Sawmill #1 is being proposed in the June 8, 2005 Work Plan.

> *From historic maps of the site, there have been operations south of the east end of Sawmill Number 1. Identifications on the maps include "No 5 Shingle Mill" and "Eng Ho". This area should be evaluated.*

Both the Former Number 5 Shingle Mill and Engine House areas are being proposed for investigation in the June 8, 2005 Work Plan.

> *It should be noted that some of the soil samples analyzed for TPH and VOCs were analyzed outside the hold time for the analyses. These samples were the second soil samples taken from borings P5-2@5', P5-22@5', P5-24@5', P5-25@5', and P5-26@5'.*

Comment acknowledged. Future work that is being proposed in the June 8, 2005 Work Plan will utilize quality control protocols described in the associated QAP to mitigate the possibility of exceeding sample analytical hold times. The laboratory will track sample hold times from sample receipt until analysis as part of this process.

Sawmill #1

> *I concur with the Phase II recommendation to excavate soils in this area when the foundation is removed. In addition, the extent of the contamination found should be investigated.*

Investigation and IRMs for soil beneath Former Sawmill #1 were addressed in AME's March 21, 2005 Work Plan.

Log Pond

> *Through the history of this facility, the log pond has had the potential to receive discharges and wastes from various operations. The sediments of the log pond need to be investigated. This investigation needs to extend through the full depth of sediments and fill.*

Investigation of the full depth of sediments in the Log Pond is being proposed in the June 8, 2005 Work Plan. An evaluation of COPCs associated with discharges to the Log Pond have been made and will be used as the basis for chemical testing of samples collected from the Log Pond under the June 8, 2005 Work Plan.

Area West of Mobile Equipment Shop, Mobile Equipment Shop, Washdown Building, Fuel Storage and Dispenser Building, Tire Shop, Log Pond Fill Material Area

> *A significant amount of petroleum contamination has been found in this general area. The extent of this contamination needs to be investigated, both laterally and vertically. This includes not only looking in the generally downgradient direction but also investigating the source areas more in other directions.*

The June 8, 2005 Work Plan will propose additional investigation of the extent of COPC impact to soil and ground water in the Area West of the Mobile Equipment Shop and at the Mobile Equipment Shop, Fuel Storage and Dispenser Building, Tire Shop, and Log Pond Fill Material Area.

> *Low levels of chlorinated solvents have also been detected in this area. Chlorinated solvents should be included with the further investigation. In addition, the chlorinated solvent PCE has been detected in groundwater samples from the gas station area in Parcel 5. While the gas station is the subject of a separate Regional Water Board case, the PCE detected may be contributing to the chlorinated solvent detections in the shop area. Although a different*

> *responsible party is performing that investigation, the gas station is on Georgia-Pacific property. You should have groundwater samples from these monitoring wells analyzed for chlorinated solvents. Also, the potential for the chlorinated solvents to be coming from off-site should be evaluated.*

Analysis for chlorinated VOCs will be included in the scope of work proposed in the June 8, 2005 Work Plan. G-P was allowed access by the responsible party for the nearby service station to sample their monitoring wells in May 2005. Analysis of these samples included testing for chlorinated VOCs to evaluate ground water conditions upgradient of the Mobile Equipment Shop.

> *The fuel lines in these areas should be dug up and the soil examined for impacts.*

The June 8, 2005 Work Plan will include the removal of the used oil and lube oil lines west of the Mobile Equipment Shop and sampling and analysis of soil beneath the lines.

> *Future investigation in the log pond fill material area should also extend down to native material. It does not appear from the boring and pothole logs that the investigation performed so far has reached native material under the fill.*

The June 8, 2005 Work Plan includes a geophysical survey to evaluate the extent of the log pond fill area. Borings planned in this area will extend down to native soil to evaluate the full thickness of the fill material.

Transformer Pad

> *A detection of 0.035 mg/kg PCBs was detected in one of the three surface soil samples taken in this area. This area should be investigated further, including vertically, for PCBs.*

An investigation of the area of soil PCB detection is being proposed in the June 8, 2005 Work Plan. The proposed investigation includes the advancement of four soil borings with continuous soil sampling down to the water table.

Former Boarding House Area

> *According to the Phase I report, this area was investigated due to an oil house shown to the west of the boarding house on the Sanborn maps. Comparing features on both the Sanborn maps and in the Phase II investigation map for this location, it appears that the two borings performed for this area, P5-43 and P5-44, may have been south of the oil house location. This should be further evaluated.*

Based on a review of the 1960s facility map, it appears that borings P5-43 and P5-44 were located south of the Former Oil House location. The June 8, 2005 Work Plan will propose two borings at the location of the Former Oil House to assess potential petroleum impact.

PARCEL 6

> *The facility map from the 1960's shows a gas pump and buried gasoline storage tank to the east of the veneer plant. The veneer plant was the northern section of the more current planer Number 2 building. From the old aerial photographs in the September 9, 2004 TRC* Response to Comments*, it appears that the location of the gas pump on the 1960's facility map was in the area of the northeast corner of the planer Number 2 building.*

Based on a review of the 1960s facility map, two borings to investigate the location of the gasoline pump and associated UST are being proposed in the June 8, 2005 Work Plan.

> *The 1960's facility map shows a truck shop located in what appears to be the southern side of Parcel 6. This building can also be seen in the 1963, 1966, 1973, and 1982 aerial photographs provided in the TRC* Response to Comments *report. The location does not coincide with the investigation that was performed around the shipping office (an undated map in our files does identify the shipping office location as a truck shop). This additional truck shop location needs to be investigated.*

The location of the Former Truck Shop has been reviewed on the 1960s facility map. An investigation of that area with three borings is being proposed in the June 8, 2005 Work Plan.

> *The area in which the shipping office is shown in the Phase I report had in the 1960's facility map building labeled as "No 8 Fiber Plant", "Warehouse", and "Bark Shelter". These structures coincide with structures in the old aerial photographs of the site. The 1960's facility map also shows an oil house to the west of the northwest corner of the fiber plant. The oil house area should be investigated.*

Two soil borings are being proposed in the Former Oil House area in the June 8, 2005 Work Plan. Also being proposed in the June 8, 2005 Work Plan is an investigation of the No. 8 Fiber Plant area for the COPCs listed in attached Table 1.

<u>Hazardous Waste Storage Area</u>

> *The PCB detection in soil sample P6-1@0.5' indicates a PCB impact in that area. The extent of the impact should be investigated.*

The area of soil sample PCB detection at boring P6-1 is being proposed for further investigation of PCBs in the June 8, 2005 Work Plan.

> *A petroleum impact to soil was found with the two borings performed in this area. The extent of the impact should be investigated. It should be noted that the soil sample P6-2@3' was analyzed out of the normal hold time for the TPH analysis.*

The extent of petroleum impact to soil in the area of boring P6-2 is being proposed in the June 8, 2005 Work Plan with the advancement of four borings. Acknowledgement is made that soil sample P6-2@3' was analyzed outside of the normal hold time for TPH analysis. Future work that is being proposed in the June 8, 2005 Work Plan will utilize quality control protocols described in the associated QAP to mitigate the possibility of exceeding sample analytical hold times. The laboratory will track sample hold times from sample receipt until analysis as part of this process.

> *A pothole was completed outside the building in this area (P6-PH3). The extent of the TPH impact in this area should be investigated.*

The investigation of the extent of potential soil TPH impact exterior of the building is being proposed in the June 8, 2005 Work Plan.

Planer Mill #2

> *TPH-d in groundwater was detected up to 330 µg/L in this area, which is above the water quality objective of 100 µg/L. Further evaluation of the contamination in this area is needed.*

Two borings with soil and grab ground water sampling are being proposed in the area of boring P6-3 in the June 8, 2005 Work Plan to assess potential ground water TPH impact.

> *The 1960's facility map shows a compressor house adjacent to the north side of the veneer plant (planer Number 2 building). That area should be evaluated.*

The area of the Former Compressor House north of Planer #2 is being proposed for investigation of potential petroleum impact through the advancement of two soil borings in the June 8, 2005 Work Plan.

> *It was stated in the Phase I report that this mill was operated as a plywood plant at one time. An evaluation of that use should be made on what potential impacts it could have had on soil and groundwater.*

Chemicals and COPCs associated with plywood production are identified in Table 1. Soil and ground water samples proposed in the Planer #2 area in the June 8, 2005 Work Plan will be analyzed for phenol using EPA Method 8270 to evaluate potential impacts to soil and ground water.

Shipping Office

The extent of the petroleum contamination in soil and groundwater in this area should be investigated. This includes the shipping office area covered by boring P6-14, which was grouped with P6-15 in the Phase II report but which was located next to the shipping office and not near P6-15.

The June 8, 2005 Work Plan will include four soil borings in the Shipping Office area to further evaluate the extent of petroleum impact.

The Phase II report contained a recommendation to investigate a geophysical survey anomaly in this area. That should be done.

An intrusive investigation of the geophysical anomaly identified in the Phase II ESA report is being proposed in the June 8, 2005 Work Plan.

Fill Area

In the Phase I report, it was stated that the 1973 aerial photograph showed the log pond as it currently existed. That is not accurate. The southwest end of the pond was filled in since the 1982 aerial photograph was taken. A 1/29/1996 Regional Water Board staff inspection memo indicates that part of the pond was filled in around that time.

We concur with the comment. Geophysical surveys, test borings/potholes with soil and grab ground water sampling, and monitoring wells, if warranted, are being proposed under the June 8, 2005 Work Plan to characterize the nature and extent of fill at the southwest end of the Log Pond.

The installation of one monitoring well in this area was recommended in the Phase II report. I recommend the installation of at least three monitoring wells in this area due to the size of the area and the uncertainty of the variability of materials in the fill. I also recommend that the entire fill area be geophysically surveyed to better characterize the fill.

A geophysical survey of the Log Pond West Fill Area to evaluate the limits of the fill is being proposed in the June 8, 2005 Work Plan. Monitoring well locations will be selected based on data from soil borings that will be proposed in the Fill Area.

PARCEL 7

Soil samples P7-5@0.5' and P7-11@0.5' were analyzed for TPH-d both with and without silica gel cleanup. The silica gel cleanup results for these two samples were misreported in the Phase II report. In the text and tables of the reports, the results were 1.3 mg/kg and 0.2 mg/kg, respectively. From the laboratory

analytical reports, the actual results were 1300 mg/kg and 200 mg/kg, respectively. The TPH-d results without silica gel cleanup for those samples were 1400 mg/kg and 200 mg/kg, respectively.

We concur with this comment.

The deeper soil samples (at 3') from borings P7-1, P7-4, P7-5, P7-6, P7-7, P7-10, and P7-11 were analyzed for TPH-d outside the standard hold time for the analysis, according to the laboratory reports.

Comment acknowledged. Future work that is being proposed in the June 8, 2005 Work Plan will utilize quality control protocols described in the associated QAP to mitigate the possibility of exceeding sample analytical hold times. The laboratory will track sample hold times from sample receipt until analysis as part of this process.

Hazardous Material Storage Area

Petroleum impacts were found beneath the building floor in this area. The extent of those impacts should be investigated.

An investigation to evaluate the extent of petroleum impacts in this area is being proposed in the June 8, 2005 Work Plan. Three soil borings will be proposed in the vicinity of boring P7-1.

Sawmill #2

Excavation of soil around borings P7-3, P7-4, and P7-5 was recommended in the Phase II report. I concur with that recommendation.

We concur that soil remediation in the area of borings P7-3, P7-4, and P7-5 is warranted based on TPHd data from soil samples collected at those locations during the Phase II ESA.

Petroleum impacts were also detected in other borings in this grouping. The extent of those impacts should be investigated.

Petroleum impacts were also reported in samples from borings P7-7 and P7-8 interior of Sawmill #2. The extent of these impacts will be investigated upon demolition of the building under a future CDP.

TP Burner And Fuel Aboveground Storage Tanks

Further investigation of the soils at boring P7-10 was recommended in the Phase II report. Further investigation of the impacts in this area is needed. Also, please provide a diagram relating the geophysical survey results in this area with the boring locations.

Further investigation of soils in the vicinity of boring P7-10 is being proposed in the June 8, 2005 Work Plan. The June 8, 2005 Work Plan also proposes submittal of a diagram relating the geophysical survey results from the Phase II ESA with the boring locations in this area as recommended.

Transformers

No comment.

Comment acknowledged.

South Ponds

The diesel tank, generator, and pump area next to the aeration pond was not sampled. That area should be investigated.

The area of the Former Diesel Tank, Generator, and Pump north of the aeration pond is being proposed for investigation of potential petroleum impact in the June 8, 2005 Work Plan.

The possibility of past dumping of various wastes into the ponds and associated potential impacts needs to be evaluated.

Sediment sampling and chemical analyses associated with COPCs identified as related to past operations is being proposed at each of the south ponds in the June 8, 2005 Work Plan. The sediment samples will be analyzed for TPHd, TPHo, VOCs, PAHs, and California Title 22 metals. Select samples will be additionally analyzed for dioxins and furans and PCBs where PAHs are present.

Sediment Drying Area

From the laboratory reports, soil sample P7-29@0.5' had a detection of 0.36 mg/kg fluoranthene, which was not noted in the Phase II report text or tables.

We concur with the comment. The data in question has been included in AME's recently developed database for future reporting.

It appears from the Phase II report that an ash pile remains in this area. The disposal or long-term disposition of this material needs to be addressed.

Stockpile sampling and analysis of the Parcel 7 ash pile is being proposed in the June 8, 2005 Work Plan. An evaluation of this data will be made to assess disposal and/or treatment options.

Existing Groundwater Wells

Abandoning these wells was recommended in the Phase II report. I concur with properly decommissioning these wells.

Proper decommissioning of these wells is being proposed in the June 8, 2005 Work Plan.

Stockpile

Proper disposal or onsite treatment of this material was recommended in the Phase II report. I concur with the recommendation.

Stockpile sampling and analysis of the Parcel 7 stockpile apparently from removal of an underground storage tank (UST) is being proposed in the June 8, 2005 Work Plan. An evaluation of this data will be made to assess disposal and/or treatment options.

PARCEL 8

In some of the aerial photographs of the site, particularly the 1966 photographs in the Additional Assessment Report, one or two small structures are visible northeast of the southern end of the runway. While this is in the same area as the geophysical survey and pothole done at the southern end of the runway, these structures appear to have been farther east than where the survey and pothole were performed. The former location of these structures should be evaluated.

The location of these former structures has been reviewed in the aerial photographs referenced in the comment. Investigation of the soil and ground water beneath these structures is being proposed to assess potential petroleum impact in the June 8, 2005 Work Plan.

PARCEL 9

Tree Nursery Area

Some pesticides were detected in the groundwater in the nursery area. Further groundwater investigation was recommended in the Phase II report. The extent of the groundwater contamination should be investigated.

Investigation of the extent of potential ground water pesticide impact in the Tree Nursery area is being proposed in the June 8, 2005 Work Plan.

Our files contain a November 4, 1983 letter from Rex Timber Inc. (noted as "A subsidiary of Georgia-Pacific Corporation") listing the pesticides used at the time at the nursery and describing the use of a sump. The greenhouse sump was described as being a "10' x 10' x 10' " sump that took pesticide wastes. A map with the letter showed the sump was located inside the greenhouse directly east of the small building on the west side of the greenhouses. There was a discharge line from the building to the sump. Pesticide container rinsate was discharged to the sump. The practice was reportedly stopped in 1983. This sump could have been a route for pesticides to contaminate soil and groundwater without contaminating

surface soil. Deeper investigation of the soils around the sump needs to be conducted.

An investigation of the deeper soils in the sump area is being proposed in the June 8, 2005 Work Plan. Analysis of soil and ground water samples collected in this area will include pesticides associated with the Nursery as listed in Table 1.

The November 4, 1983 letter listed the following pesticides as being used at the nursery:

- *Fungicides*
  - *Botran 75W*
  - *Benlate WP*
  - *Daconil 2787*
  - *Dithane M-45*
  - *Captan 50-WP*
  - *Truban*
  - *Banrot 40-WP*
- *Insecticides*
  - *Diazinon*
  - *Malathion*

The Phase II report did not contain a comparison of the pesticides known to be used at the site and the pesticide analytical target list. Such a comparison needs to be made. It was stated in the Phase II report that the initial soil sample analyses performed did not follow the analysis plan that was stated to have been prepared (but was not included in the report). It was not stated if the follow-up groundwater sampling followed the plan. In addition, the analyses performed on the P9-17, P9-18, and P9-19 water samples did not appear to include each of the compounds found in the three soil samples with pesticide detections. A clear analysis plan needs to be prepared before additional sampling is performed.

The requested comparison of pesticides used at the Nursery with a pesticide target analytical list has been developed and is included in Table 1. Analytical test methods, if available, have been identified for most of these compounds.

Scrap Metal Area

I have no further comment on this area in addition to the general comments for the site.

Comment acknowledged.

Transformer

No comment.

Comment acknowledged.

PUBLIC COMMENTS

I have received comments that the Phase I assessment was insufficient and that additional former employees should be interviewed instead of just the few managers that were interviewed for the report.

G-P welcomes former employees willing to come forward for interviews regarding past operations at the facility. We will work with the City of Fort Bragg and RWQCB to identify potential interviewees for this purpose.

I have received comments that the entire site should be geophysically surveyed in the same manner that the two additional areas were geophysically surveyed last August.

Performing a geophysical survey of the entire site is not warranted based on studies of historical operations that have concluded that most of the activities were limited to specific areas of the site. If information is available regarding past operations in other areas, this information should be made available to G-P to evaluate potential further investigations.

I have received comment that the dumping of wastes into shallow pits that were then paved over was a regular occurrence.

Anyone with specific information as to the location of these alleged waste pits is encouraged to come forward so that an evaluation can be made of the presence of such pits.

A former employee stated that the nursery had both open and closed (covered) storage. Open storage was on pallets with staining and evidence of spilling. Roundup and other agriculture chemicals were used. At one time, Georgia-Pacific personnel worked with UC Berkeley on experimenting with different agriculture chemicals in the field to kill pests and those chemicals may have been stored at the nursery. The personnel office at the time had the MSDSs for those chemicals.

A target pesticide analytical list has been developed based on past pesticide usage at the Nursery. If there is additional information available on other pesticides used at the Nursery, it could be included in the list of COPCs, if warranted.

A former employee stated that some of the solvents used at the site were chlorinated.

Chlorinated VOCs have been reported in some of the soil and ground water samples collected at the site validating this comment.

> *A former employee stated that there was lots of spilling of solvents at the electrical shop.*

Analysis for VOCs will be performed on soil samples collected beneath the electrical shop under a future CDP when the foundation is removed. This will allow an evaluation of solvent impact to the subsurface in the area.

> *A former employee stated that there could be high concentration point sources of contamination at the small sheds and that the site had been riddled with small sheds.*

Anyone with specific information regarding the location of these sheds and nature of substances stored there should share these details with G-P so that an evaluation can be made of any environmental impact.

> *I have received comment that pentachlorophenol had been used on a regular basis in that past and that some waste pentachlorophenol had been dumped in the southern end of the site.*

As stated previously, anyone with specific information regarding dumping of pentachlorophenol at the site should come forward so that an evaluation of these potential practices can be made. Available information from the current supervisor, Mr. Paul Johnson, indicates that only limited use of pentachlorophenol occurred at the facility.

> *I have received comment that two capacitors were dumped into the log pond, potentially in an area of the pond that was subsequently filled.*

Sediment samples from the log pond will be analyzed for PAHs and may be tested for PCBs if PAHs are detected under the scope of work being proposed in the June 8, 2005 Work Plan. PCBs are often associated with electrical transformers and capacitors.

> *I have received comment that various wastes were dumped in various ponds on the site.*

The collection of sediment samples from the various ponds at the facility is being proposed in the June 8, 2005 Work Plan. Chemical analysis of these samples will be used to identify the presence of waste materials.

> *I have received comment that metal (e.g. cars, machines, pipes) and solvents were dumped in the marsh area north of the nursery area on the east side of the site.*

Investigation of the marsh area north of the Nursery is not being proposed as part of the June 8, 2005 Work Plan. An investigation of this area will be considered if additional information regarding the alleged past practices is made available to G-P.

I have received comment that some dump spots had drains to the ocean.

G-P is willing to discuss potential dump spots with drains to the ocean with anyone willing to come forward with specific information regarding this alleged practice.

I have received comments that there was regular dumping of hydraulic oils around the Cat shop.

An investigation of subsurface conditions around the Parcel 3 Former Mobile Equipment Shop and Parcel 5 Mobile Equipment Shop is being proposed as part of the March 21, 2005 Work Plan and June 8, 2005 Work Plan, respectively. If anyone has additional information regarding another shop other than those two mentioned, we would be interested in discussing the matter with them.

I have received comment that on July 4, 1977, the site took around 25-35 truckloads of contaminated oil from Martinez to burn in the incinerators. It was said that that was not the only occurrence; it was done regularly on a smaller scale.

We have discussed this issue with an EPA representative familiar with the lumber mill and he stated that they do not have any reports on file regarding incidences of burning of contaminated oil at facility's Powerhouse boilers.

It has been said that there is a lagoon near the residential area at the south end of the site that received solvent dumping.

G-P is willing to investigate the presence of solvents in the referenced lagoon provided that someone comes forward with specific information of the alleged dumping activity.

I have received comment that there is a pit or pits in the bottom of the powerhouse that received oils.

Investigation of soils beneath the Powerhouse is included in the scope of work described in the March 21, 2005 Work Plan. Judgmental and systematic sampling of soil beneath the building foundation will be performed to evaluate the presence of COPCs in soil. Several pits for hydraulic units are identified on emergency response plan drawings for the Powerhouse.

I have received comment that various wastes were put through the hog and were subsequently burned in the powerhouse.

G-P personnel have indicated that some urban wood waste was processed through the hog and burned in the Powerhouse. This process occurred only during approximately 2000 and 2001 and was undertaken to provide supplemental electricity to the City of Fort Bragg in response to a power crisis. The Mendocino County Air Quality Management District placed restrictions on the composition of the waste as part of this program.

Investigation of soils beneath the Powerhouse is included in the scope of work described in the March 21, 2005 Work Plan. Judgmental and systematic sampling of soil beneath the building foundation will be performed to evaluate the presence of COPCs in soil. Investigation of ponds that may have received wastes is being proposed as part of the June 8, 2005 Work Plan.

> *The above public comments should be considered and addressed when preparing workplans for further investigative work at the site.*

Responses to comments from the public are provided above. If the RWQCB recommends any specific investigations associated with these public comments, we would be willing to discuss them at that time.

Very truly yours,

ACTON • MICKELSON • ENVIRONMENTAL, INC.

Michael A. Acton, R.E.A.
Vice President

Mark W. Clardy, R.G.
Project Geologist

Enclosures:
1. Table 1—Selection of Chemicals of Potential Concern
2. Hazardous Materials Business Plan, Emergency Response Plan Drawings, 16 pages
3. Letter from AME to California Office of Environmental Health Hazard Assessment dated April 15, 2005, 3 pages
4. TRC *Report of Findings, Preliminary Investigation, Demolition Support Services, Georgia Pacific Fort Bragg Facility, Fort Bragg, California* dated April 15, 1998

cc: Ms. Julie Raming, Georgia-Pacific Corporation
Mr. Doug Heitmeyer, Georgia-Pacific Corporation
Ms. Linda Ruffing, City of Fort Bragg
Ms. Kay Johnson, Tetra Tech, Inc.

MA:MWC:tm